

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**DON HOLLAND, individually and on behalf §
of all others similarly situated, §**

Plaintiff, §

v. §

**CRYPTOZOO, INC., a Delaware §
Corporation, LOGAN PAUL, DANIELLE §
STROBEL, JEFFREY LEVIN, EDUARDO §
IBANEZ, JAKE GREENBAUM a/k/a §
CRYPTO KING, and OPHIR BENTOV §
a/k/a BEN ROTH §**

Defendants. §

CIVIL ACTION NO.: 1:23-cv-110

UNSWORN DECLARATION OF BRAD W. SEILING

I, Brad W. Seiling, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and admitted *pro hac vice* to appear before this Court. I am a partner at the law firm of Manatt, Phelps & Phillips, LLP, counsel of record in this action for Defendants Jeffrey Levin and Ophir Bentov. I make this declaration on the basis of my personal knowledge, and if called as a witness, I could and would testify competently thereto under oath.

2. On January 5, 2024 at 2:12 p.m. PST, I received a voicemail from Leigh Montgomery, counsel for Plaintiff Don Holland (“Plaintiff”) in this matter. On the voicemail, Ms. Montgomery stated that Plaintiff intended to file a motion for leave to file an amended complaint to add individual claimants and securities claims (the “Original Motion”). Ms. Montgomery represented that Defendant Logan Paul opposed the Motion and thus, Plaintiff would “have to” file it.

3. I did not speak to Ms. Montgomery or any other attorney representing Plaintiff about the contents of the Original Motion or Plaintiff’s proposed First Amended Complaint before Plaintiff filed the Original Motion later that same day.

4. On Friday, January 12, 2024, I received an email from counsel for Defendant Paul that included counsel for Plaintiff and Defendant Danielle Strobel. The email chain revealed that Plaintiff intended to file an amended motion for leave (the “Amended Motion”) to add additional claimants to the proposed First Amended Complaint. Plaintiff’s counsel filed the Amended Motion later that same day without speaking to me. I did not receive a voicemail, email, or any other communication from Plaintiff’s counsel before they filed the Amended Motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 29, 2024 at Los Angeles, California.

/s/ Brad W. Seiling

BRAD W. SEILING